

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

**PLAINTIFFS' UNOPPOSED MOTION TO
AMEND PLAINTIFFS' EXHIBIT LIST TO INCLUDE EXPERT CVs¹**

Plaintiffs move to amend Plaintiffs' Exhibit List to add the CVs of Plaintiffs' experts Goranka Bjedov, Paul Crisci, Robin Lee, and Jon Weissman. These CVs were included in the respective expert reports' appendices, and are attached hereto as **Exhibits A, B, C, and D**.

The proposed Amended Exhibit List is attached hereto as **Exhibit E**.

Local Rule 16 provides that parties can seek to amend scheduling orders upon a showing of good cause.

Plaintiffs timely filed Plaintiffs' Trial Exhibit List on August 15, 2025 (ECF No. 1565), in accordance with this Court's Order of August 5, 2025 (ECF No. 1560). As noted on the cover page of Plaintiffs' Trial Exhibit List, Plaintiffs reserved the right to seek the Court's leave to amend or supplement their exhibit list. (ECF No. 1565).

Good cause exists to amend Plaintiffs' exhibit list to include Plaintiffs' experts' CVs because they are relevant to Plaintiffs' claims, are relevant to Google's motion to exclude one of Plaintiffs' experts filed after the exhibit lists were filed (see, e.g., ECF Nos. 1580), are already in Google's possession, are included in the respective experts' reports, and submitting the CVs as

¹ Plaintiffs reserve the right to seek the Court's leave to further amend their exhibit list.

exhibits at trial will streamline the presentation of Plaintiffs' expert credentials. Google has indicated that it does not oppose this motion.

WAIVER OF ORAL ARGUMENT:

Plaintiffs waive oral argument on this procedural motion.

Dated: September 12, 2025

Respectfully submitted,

ERIK S. SIEBERT
United States Attorney

/s/ Gerard Mene
GERARD MENE
Assistant U.S. Attorney
2100 Jamieson Avenue

Alexandria, VA 22314
Telephone: (703) 299-3777
Facsimile: (703) 299-3983
Email: Gerard.Mene@usdoj.gov

/s/ JULIA TARVER WOOD
JULIA TARVER WOOD
/s/ MATTHEW E. GOLD
MATTHEW E. GOLD
DAVID A. GEIGER
MATTHEW R. HUPPERT
MICHAEL E. WOLIN
United States Department of Justice
Antitrust Division
450 Fifth Street NW, Suite 7100
Washington DC 20530
Telephone: (202) 307-0077
Facsimile: (202) 616-8544
Email: Matthew.Gold@usdoj.gov
Attorneys for the United States

JASON S. MIYARES
Attorney General of Virginia

/s/ Tyler T. Henry
TYLER T. HENRY
Assistant Attorney General

Office of the Attorney General of Virginia
202 North Ninth Street
Richmond, VA 23219
Telephone: (804) 692-0485
Facsimile: (804) 786-0122
Email: thenny@oag.state.va.us

*Attorneys for the Commonwealth of Virginia
and local counsel for the States of Arizona,
California, Colorado, Connecticut, Illinois,
Michigan, Minnesota, Nebraska, New
Hampshire, New Jersey, New York, North
Carolina, Rhode Island, Tennessee,
Washington, and West Virginia*